

Judge Richard A. Jones

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRIAN FARRELL,

Defendant.

NO. CR15-029RAJ

**JOINT MOTION TO CONTINUE
DISCOVERY DEADLINE FOR
ONE WEEK**

The United States of America, by and through Annette L. Hayes, United States Attorney for the Western District of Washington, and Thomas M. Woods, Assistant United States Attorney for said District, and Defendant, Brian Farrell, by and through his counsel, Nancy Tenney, hereby move the Court as follows:

On November 13, 2015, the Court set a discovery cutoff in this matter of December 4, 2011. The government has had numerous calls with multiple counsel from two separate components of the Department of Justice, who in turn, have been gathering responsive documents from the FBI and outside the Department of Justice. The government expects to produce to the defense documents, along with affidavits explaining some aspects of the documents to be produced. Those affidavits are close to complete, but not yet finished, in part because the defense has served recent discovery requests, dated November 24, 2015. In light of the recent discovery requests, and the

1 need to confer with the multiple components and agencies, the parties request that the
2 discovery cutoff be extended one week, until December 11, 2015.

3 The parties suggest that the Court otherwise keep the same basic case schedule,
4 and suggest the following:

5 To the extent the defense pursues a motion to compel, the deadline could be
6 changed from December 11 to December 18. The government's response would be due
7 December 30. The defendant's reply would be due January 5. The hearing date of
8 January 7, 2016, if necessary, would remain the same.

9 DATED this 3rd day of December, 2015.

10 Respectfully submitted,

11 ANNETTE L. HAYES
12 United States Attorney

13
14 /s/ Thomas M. Woods
15 THOMAS M. WOODS
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23 /s/ Nancy Tenney
24 NANCY TENNY
25 Attorney for Brian Farrell
26 Per email authorization
27
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CERTIFICATE OF SERVICE

I hereby certify that on December 3, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorney of record for the defendant.

/s/ Salee Porter
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